

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	22-006093
<b>PROSECUTOR NO. :</b>	095470913
<b>OCN:</b>	pq005811

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JEREMY D BROWN JR</b>	)	
<b>1814 E. 84th Street</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64132</b>	)	<b>DIVISION</b>
<b>DOB: 05/08/2003</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about August 15, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from white Ford Escape, a motor vehicle, and as a result of the above described conduct, suffered injury.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**State vs. Jeremy D Brown Jr**

**Count II. Armed Criminal Action (571.015-001Y20205299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the **felony of armed criminal action**, punishable upon conviction under Section (571.015.1), RSMo, in that on or about August 15, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

**State vs. Jeremy D Brown Jr**

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ J. Timothy Yasso*  
J. Timothy Yasso (#59342)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-4612  
jyasso@jacksongov.org

**WITNESSES:**

1. [REDACTED]
2. DET Phillip Stewart, 10 NE Tudor, Lee's Summit, MO 64086
3. [REDACTED]

# STATEMENT OF PROBABLE CAUSE

Date: 8/16/22

Lee's Summit P.D. Case Number: LSPD22-06093 1st Degree  
Assault

I, Detective 1001 - Stewart, Phillip Jr, an investigator with the Lee's Summit, Missouri, Department of Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that **8-15-2022**, in the area of **SW Kline, Lee's Summit Missouri**, the suspect, **BROWN, JEREMY D, JR (Race: Black or African American, Sex: Male, DOB: 5/8/03, and [REDACTED]** committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 8-15-2022 at about 0023hrs Lee's Summit Police Officers were dispatched to 1534 SW Arbor Creek Drive, Lee's Summit Missouri regarding a shooting. On arrival they contacted [REDACTED] who suffered a gunshot wound to his lower back. [REDACTED] was soon transported from the scene for medical treatment. It was later learned [REDACTED] will be in the hospital for several more days and sustained broken ribs and his spleen was removed.

At the scene with [REDACTED] was [REDACTED] (a juvenile [REDACTED]) and [REDACTED] (a juvenile [REDACTED]) who were with [REDACTED] at the time he was shot. In speaking with these witnesses, it was learned they had a confrontation with [REDACTED] (a juvenile [REDACTED]) who drives a white Ford Escape.

After the confrontation [REDACTED] and the witnesses left the area in a [REDACTED] vehicle and were chased by [REDACTED] driving a white Ford Escape. When they were in the area of SW Kline, Lee's Summit Missouri, someone from [REDACTED] vehicle began shooting at them with [REDACTED] being struck.

- The witnesses reported hearing 8 to 10 shots.

In an examination of [REDACTED] vehicle DET James TRACEY and I observed two obvious points of bullet entry to the rear of [REDACTED] vehicle. It appears one bullet traveled through the interior of the vehicle, through the front passenger side seat, where [REDACTED] was seated.

DET Steve OWNINGS and OFC Scott MCMILIAN checked the are of SW Kline. There they located 9 "Sig 300" shell casings in the roadway.

A check of [REDACTED] residence, [REDACTED] Lee's Summit Missouri was later conducted. Parked in the driveway was a white Ford Escape with Missouri plates JF1N53. Contact was soon made with [REDACTED] and her mother [REDACTED]. An interview was later conducted with [REDACTED] with her mother and a Juvenile Officer present. [REDACTED] stated there had been a confrontation with a group of people that [REDACTED] was with. After that confrontation she chased after [REDACTED] and the others in [REDACTED] vehicle. With [REDACTED] during this chase was Jeremy D BROWN Jr. While chasing the others [REDACTED] aid BROWN opened the sunroof of her vehicle, stood up and out of the sunroof and began firing an unknown type rifle at [REDACTED] vehicle.

█ added that a short time prior to the shooting she had taken BROWN to his residence where he retrieved the firearm. BROWN's residence has been determined to be 1814 E 84th Street, Kansas City Missouri. When at the residence █ said BROWN retrieved the firearm. █ described it has been dismantled and in a back pack. Once in the vehicle it was assembled and soon used in the shooting. Sometime after the shooting █ stated she transported BROWN back to his residence where he took the firearm and the backpack into 1814 E 84th Street, Kansas City Missouri. When describing the firearm, █ described it as a rifle.

After BROWN's residence was determined it has been under police surveillance and a search warrant was later served. When the search warrant was served BROWN was present and taken into custody. Located in the residence were "sig 300" rounds and a rifle barrel that appeared to be capable of supporting/firing "sig 300" rounds.

On 8-16-2022 DET TRACEY and I conducted a recorded interview with BROWN. BROWN was advised of his rights to which he stated he understood. BROWN explained that on 8-14-2022 into 8-15-2022 he was with █ and others when they were confronted by others in front of █ residence. BROWN said █ asked him to get his firearms to scare those she is having problems with and BROWN agreed. █ drove BROWN to his residence where he retrieved a rifle after which █ drives him back to Lee's Summit. The group of people █ was having problems was soon located █ stopped and had a confrontation the above name █ left into the vehicle being driven by █ with █ and █ the vehicle █ chased after them and during the chase BROWN said he learned out of a side window and fired up to 8 shots towards █ vehicle. BROWN stated he had no intention of hurting any but rather to only scare them. When asked about the current location of the firearm BROWN stated it broke. He indicated the rifle barrel recovered from the search was form the firearm but he refused to tell where the remainder of the broken firearm was.

No further



08/16/22

---

Signature of Detective 1001 - Stewart, Phillip Jr

Date